



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

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Ms. Mary Lou Capichioni, Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: Route 561 Dump Site
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035
Evaluation of Soil Analytical Results and Recommendation to
Complete Soil Delineation, dated October 15, 2009

Dear Ms. Capichioni:

The United States Environmental Protection Agency (EPA) and New Jersey Department of Environmental Protection (NJDEP) have reviewed the following document: "Evaluation of Soil Analytical Results and Recommendation to Complete Soil Delineation", submitted by the Sherwin-Williams Company on October 15, 2009 and have the following comments.

1. EPA is requesting that a soil sample be collected near the fence-line, due west from sample DMSB0029. This is consistent with the rationale to collect one near the fence-line west of samples DMSB0007 and DMSB0058.
2. EPA is requesting that one sample (each) be collected approximately 40 feet due east of samples DMSB0035 and DMSB0031. Currently there exists only one sample east (DMSB0063) of these samples. DMSB0063 is approximately 80 feet east of these samples.
3. Page 2, 3rd paragraph, last sentence – Please revise the following sentence to state that: "This letter, along with the attached tables and figures, provides EPA and NJDEP a summary of all of the data that have been collected at and adjacent to, the site since the 2005 RI activities."
4. The use of non-residential direct contact soil remediation standards (NRDCSRS) for purposes of comparison on Figures 7-9 does not correspond with the residential direct contact soil remediation standards (RDCSRS) used as the screening criteria in the narrative. The color key used in Figures 7-9 should be based on multiples of the RDCSRS (19 mg/kg for As and 400 mg/kg for Pb), e.g., 2 x residential, 5 x residential, 10 x residential, etc. This would make order of magnitude differences clearer by

comparing the results to only one standard, not two standards. Also the arsenic RDCSRS and NRDCSRS are the same (19 mg/kg) but the corresponding two standards for lead (400 and 800 mg/kg) are not, so using multipliers of both residential and non-residential standards is in effect using different multipliers for presentation of lead and arsenic results.

5. Units are not provided on Figures 7-9 for the results. Because some of the results are so high, some readers could confuse parts per billion (ppb) with parts per million (ppm).
6. Section "Evaluation of soil sampling results", page 3 – The first sentence should be revised to reflect that XRF results and fix-base laboratory samples were collected during the "three" phases of sampling and not "four", as the XRF was not used during the 2005 field sampling activities.
7. Section "Evaluation of soil sampling results", page 3 – Second full paragraph, third sentence. It is stated that, "Therefore, the combined XRF field results..."; however, it should be stated that: "Therefore, the average XRF field results..."
8. Section "Area 1 – Properties West of Route 561", page 4 – The first paragraph needs to clearly state that only TAL Metals were analyzed in the soil samples collected west of Route 561. As it is currently written a reviewer would not know that all other parameters were not included as part of the soil analysis from these samples. In addition, this has to be more clearly presented in bullet number 2 on page 6.

EPA and NJDEP both approve all other sample locations as proposed. EPA is requesting that the text be revised and a revised version of Figure 10 be produced (depicting the soil samples requested by EPA). Please submit the revised text and the necessary associated figures within 30 days of receipt of this comment letter.

If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,



Carole Petersen, Chief
New Jersey Remediation Branch

cc: John Doyon, NJDEP
Patti Parvis, HDR